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IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

LARRY G. PHILPOT,

Plaintiff,

v.

PEMCO MUTUAL INSURANCE COMPANY,

Defendant.

Case No.: 2:20-cv-01564-JLR

STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINES FOR
INITIAL DISCLOSURES AND JOINT
STATUS REPORT AND DISCOVERY
PLAN

NOTE ON MOTION CALENDAR: June 18, 2021

STIPULATION

Pursuant to Local Civil Rules 7 and 10(g), the parties, through their undersigned counsel of record, hereby request from the Court an extension of 45 days to the deadlines for the parties to serve their initial disclosures and submit a joint status report and discovery plan.

The Court initially set the deadlines for the parties to serve initial disclosures and submit a joint status report and discovery plan under FRCP 26(f) and Local Civil Rule 26(f) as June 14, 2021 and June 21, 2021, respectively (Dkt. 17). On June 14, 2021, pursuant to the parties' request, the Court extended the deadline for the parties to serve initial disclosures to June 21, 2021. The parties hereby stipulate and agree that these deadlines should be extended by an additional 45 days, to August 5, 2021, for the reasons set forth below.

Good cause exists to extend these deadlines because the parties are engaged in settlement negotiations that may resolve their dispute. The requested deadline extensions will permit the parties to devote their time and efforts toward reaching a potential settlement, rather than toward discovery and related litigation tasks that may ultimately prove to be unnecessary.

1	For these reasons, the parties request that the Court extend the deadlines for the parti	
2	to serve initial disclosures and submit a joint status report and discovery plan as follows:	
3	Initial Disclosures Pursuant to FRCP 26	(a)(1): August 5, 2021
4	Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f): August 5, 2021	
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6		
7	IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD	
8	Dated this 18 th day of June 2021.	
9		
11	HOERSCHELMANN DIETZ PLLC	SEED IP LAW GROUP LLP
12	s/Nathan A. Hoerschelmann	s/Thomas A. Shewmake
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[PROPOSED] ORDER

Pursuant to stipulation, it is so ordered.

DATED this 21st day of June, 2021.

THE HONORABLE JAMES L. ROBART United States District Judge

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STIPULATION AND [PROPOSED] ORDER TO EXTEND INITIAL DISCLOSURES AND JOINT STATUS REPORT Case No. 2:20-cv-01564-JLR 3